

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD A. McCURDY, JR., et al.	:	CIVIL ACTION
	:	
v.	:	
	:	NO. 02-2879
	:	
WILLIAM STANCILL	:	
And	:	
F&A SALES AND SERVICES, INC.	:	

O R D E R

AND NOW, this day of , 2002, upon consideration of the Motion of Plaintiffs to Overrule Objections and Compel Defendant, William Stancill, to provide more specific answers to discovery, it is hereby ORDERED and DECREED that Defendant, William Stancill shall provide more specific answers to the following interrogatories: 2, 3, 4, 5, 6, 7, 8, 12, 16 and 17 within five (5) days of the date of this Order or suffer sanctions; Defendant, William Stancill, shall provide full and complete responses to Plaintiffs' Request for Production of Documents numbers 17, 18, 19, 20, 21, 22, 30 and 31 within five (5) days of this Order or suffer sanctions; Defendant, William Stancill, shall reimburse the Plaintiffs for the costs of filing this Motion. Plaintiffs' counsel may submit an Affidavit of Costs within five (5) days of the date of this Order.

BY THE COURT:

Dalzell, J.

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	:	NO. 02-2879
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WILLIAM STANCILL	:	
And	:	
F&A SALES AND SERVICES, INC.	:	

**MOTION TO OVERRULE OBJECTIONS AND TO
COMPEL MORE SPECIFIC ANSWERS TO PLAINTIFFS'
INTERROGATORIES DIRECTED TO PYRAMID CONSTRUCTION GROUP**

Plaintiffs, by and through their attorneys, Masterson, Braunfeld & Milner, LLP, hereby move this Court pursuant to Federal Rule of Civil Procedure 37 for an Order overruling objections and compelling William Stancill to provide more specific answers to Plaintiffs' Interrogatories and Request for Production of Documents and in support thereof aver as follows:

1. Plaintiffs served Defendants with Interrogatories in the form set forth as Exhibit "A" hereto on or about August 8, 2002.
2. Plaintiffs served Defendant, William Stancill, with Request for Production of Documents in the form set forth as Exhibit "B" hereto on or about August 8, 2002.
3. Defendant, William Stancill, filed Responses to Interrogatories to Plaintiffs' counsel on or about September 26,

2002 in the form set forth as Exhibit "C."

4. Defendant, William Stancill, filed Responses to Request for Production of Documents to Plaintiffs' counsel on or about September 26, 2002 in the form set forth as Exhibit "D."

5. With regard to the following interrogatories, Defendant William Stancill responded "To be supplied": 2, 3, 4, 5, 6, 7, 8, 12.

6. Defendant, William Stancill, responded "To be supplied" with regard to the following of Plaintiffs' Requests for Production of Documents: 1, 4, 7, 11, 12, 13, 14, 15 and 16.

7. With regard to the following of Plaintiffs' Requests for Production of Documents, Defendant, William Stancill, filed untimely objections on the basis that the information was in the possession of Pyramid Construction Group's bankruptcy attorney or that the information could not be provided because of the bankruptcy of Pyramid Construction Group: 17, 18, 19, 20, 21, 22, 30 and 31.

8. Upon information and belief, the answers to Plaintiffs' Interrogatories Directed to William Stancill numbers 16 and 17 are incomplete.

For the reasons set forth in the accompanying Memorandum of Law, Plaintiffs respectfully request this Honorable Court enter the attached Order requiring Defendant, William Stancill, to

provide full and complete answers to Plaintiffs' discovery requests within five (5) days.

Respectfully submitted,

MASTERSON, BRAUNFELD
& MILNER, LLP

By:

Nancy L. Goldstein, Esquire
Identification No. 40019
Attorney for Plaintiffs
Suite 702, One Montgomery Plaza
Norristown, PA 19401
(610) 277-1700

CERTIFICATION OF GOOD FAITH

I hereby certify that I have conferred with Gary Gusoff, Esquire, in an effort to resolve these issues without the need for court action.

Nancy L. Goldstein, Esquire

CERTIFICATION OF SERVICE

I, Nancy L. Goldstein, Esquire hereby certify that on the 11th day of October, 2002, I caused a true and correct copy of the Motion to Overrule Objections and to Compel More Specific Answers to Interrogatories Directed to Pyramid Construction Group and the Memorandum of Law in Support thereof to be served upon the following counsel counsel by transmitting same via facsimile number (215) 717-1220.

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1617 John F. Kennedy Boulevard
Suite 1250, One Penn Center
Philadelphia, PA 19103
215-717-1212
Attorney for Defendant
William Stancill

MASTERSON, BRAUNFELD & MILNER, LLP

By: _____
Nancy L. Goldstein, Esquire

Dated: _____